

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: BARBARA ANNE KOLE : CHAPTER 13  
Debtor(s) :  
 :  
CHARLES J. DEHART, III :  
STANDING CHAPTER 13 TRUSTEE :  
 :  
vs. :  
 :  
BARBARA ANNE KOLE :  
Respondent(s) : CASE NO. 1-17-bk-00445

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 9<sup>th</sup> day of March, 2017, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

1. The Trustee avers that debtor(s)' plan is not feasible based upon the following:
- a. Insufficient Monthly Net Income as indicated on Schedules I and J.
  - b. The debtor(s) has previously filed a Chapter 13 Plan for payment of mortgage arrears and defaulted under said plan.
  - c. Plan ambiguous

(1) Payment – Section 2A

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Charles J. DeHart, III  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 23rd day of March, 2017, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Gary Imblum, Esquire  
4615 Derry Street  
Harrisburg, PA 17111

/s/Deborah A. Behney  
Office of Charles J. DeHart, III  
Standing Chapter 13 Trustee